

4. The Court has original jurisdiction over such causes of action that arise under the Constitution and the laws of the United States. 28 U.S.C. §§ 1331, 1441(a).

5. Mr. Thomas also asserts a cause of action under Virginia law arising from the same case and controversy as his cause of action giving rise to federal question jurisdiction. Exh. 1, Compl. ¶¶80-90. The Court has supplemental jurisdiction over the state law cause of action pursuant to 28 U.S.C. § 1367.

6. The Eastern District of Virginia, Richmond Division, is the United States District Court, and division thereof, embracing the place where the state court action is pending. 28 U.S.C. § 1446(a).

7. A copy of all process, pleadings and orders served upon CCS are filed with this notice as Exhibits 1 and 2, pursuant to 28 U.S.C. § 1446(a). These documents are the complaint, records¹ attached to the complaint and the summons.


8. This notice is filed within 30 days after service of the initial pleading upon CCS and is therefore timely pursuant to 28 U.S.C. § 1446(b).

9. CCS shall promptly file with the Richmond Circuit Court a notice of the filing of this notice of removal, with exhibits, and serve a copy of such notice and exhibits on Mr. Thomas' counsel pursuant to 28 U.S.C. § 1446(d).

WHEREFORE, Correct Care Solutions, LLC requests that the Court assume jurisdiction over this action.

¹ Counsel for CCS has redacted personal identifiers and other information protected from disclosure from records which Mr. Thomas attached to the complaint.

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CERTIFICATE OF SERVICE

I certify that on August 18, 2014, I sent the foregoing via electronic mail and first class
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